

Docket 98-67

-----Original Message-----

From: Jon Sharpe [mailto:Sharpe@LormarLogic.com]**Sent:** Friday, August 15, 2003 1:27 PM**To:** Dane Snowden**Subject:** Wireless TRS

RECEIVED

AUG 18 2003

Federal Communications Commission
Office of the Secretary

Ladies and Gentlemen:

This correspondence is directed to our contact of record at AT&T Relay, Hamilton Relay, and Sprint Relay. Additionally, copies are being provided to the U.S. FCC Commissioners, as well as to as many individual state TRS governing bodies as is practicable. This correspondence is not a solicitation.

In March of 2003, Lormar Logic Company began routing wireless, Internet-based TRS calls to the Tennessee TRS Center operated by MCI Relay. This particular TRS center was chosen simply because of the fact that the Lormar Logic server is located in Tennessee, and this is the TRS center which is contacted when our server dials 711. Lormar Logic Company has absolutely no relationship with MCI whatsoever or any of its related subsidiaries. Lormar Logic assumed that MCI would be amiable to this routing, since each call was clearly identified as an Internet-based call, and was assumed to be reimbursable by the Interstate TRS Fund. MCI Relay personnel were informed of this configuration both verbally and electronically at the onset.

The value of this system to the deaf and hard-of-hearing community cannot be overstated. There is no other system in the United States that allows a deaf person to place a wireless call to a hearing person using an off-the-shelf, stand-alone wireless device. Like IP Relay, use of this system is free of charge to the user.

On August 12th, 2003, for whatever reason, MCI Relay made the decision to begin requiring users of this system to supply a long distance calling card number prior to completing a relay operator call. Many, many calls were not completed because of this change. Lormar Logic Company immediately contacted MCI Relay in order to request that any applicable tolls be charged to Lormar Logic instead of the user. To the best of Lormar's knowledge, no further action was taken by MCI Relay.

Since these calls are Internet-based, Lormar Logic has no means to identify the state of origin of these calls. Unlike cellular phone calls to TRS centers, Lormar cannot even determine the state of origin of the callers' service. In order to keep this invaluable service in operation, the Lormar Logic servers were reprogrammed at 12:01 am on August 14, 2003 to route the calls to the state TRS center associated with the destination of the call. The access numbers being used were gleaned from the U.S. FCC website.

As previously stated, each of these calls will be clearly identified as being a wireless, Internet-based call routed through Lormar Logic. During testing, it was determined that calls to the State of California had the potential to reach MCI Relay, with the caller again being requested to provide a calling card number. For this reason, all calls to California are now routed to Sprint's direct number, rather than the California generic TRS number.

At this time, Lormar Logic is providing this service without any compensation. Lormar Logic is determined to make this new and exciting technology available to the deaf community, while at the same time building name recognition within the community in order to grow Lormar's non-TRS wireless TTY calling business. Lormar does not view MCI's actions in a favorable light, and given the fact that the FCC has made it clear that new technology which provides tools for attaining equal access will be embraced, it is felt that the community, the regulators, and our legislators may hold a similar view.

Lormar Logic Company hereby commits, to each affected TRS provider, that calling records, showing date, time, duration, number called, and originating IP address for those calls routed to their respective TRS centers, will be available for inspection.

Any questions or concerns may be directed to the undersigned.

Sincerely,

Jon B. Sharpe

President

Lormar Logic Company

(865) 633-5080 V

sharpe@lormarlogic.com